

From: **Travis Cohron** tcohron@clarkquinnlaw.com 
Subject: RE: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]
Date: March 12, 2021 at 2:14 PM
To: Allen, Justin A. justin.allen@ogletree.com, Cento Law cento@centolaw.com
Cc: Sheri Hood  sheri@centolaw.com, Martin, Bonnie L. Bonnie.Martin@ogletreedeakins.com

The 31st it is. Thank you.

Travis Cohron
320 N. Meridian Street, Suite 1100
Indianapolis, IN 46204
317.637.1321 Phone 324 Extension 317.687.2344 Fax
tcohron@clarkquinnlaw.com
www.clarkquinnlaw.com



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From: Allen, Justin A. [mailto:justin.allen@ogletree.com]
Sent: Friday, March 12, 2021 2:04 PM
To: Travis Cohron; Cento Law
Cc: Sheri Hood ; Martin, Bonnie L.
Subject: RE: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

Unfortunately, 3/29 won't work on our end. We could do 3/31 or 4/1, if either of those work. Thanks,

Justin A. Allen | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
111 Monument Circle, Suite 4600 | Indianapolis, IN 46204 | Telephone: 317-916-2533 | Fax: 317-916-9076
justin.allen@ogletree.com | www.ogletree.com | [Bio](#)

From: Travis Cohron <tcohron@clarkquinnlaw.com>
Sent: Friday, March 12, 2021 1:56 PM
To: Allen, Justin A. <justin.allen@ogletreedeakins.com>; Cento Law <cento@centolaw.com>
Cc: Sheri Hood  <sheri@centolaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: RE: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

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My apologies for complicating this at the last minute but could we do the 29TH at 9 instead? I have a settlement conference on the 30th.

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From: Allen, Justin A. [mailto:justin.allen@ogletree.com]
Sent: Friday, March 12, 2021 1:36 PM
To: Cento Law
Cc: Sheri Hood ; Travis Cohron; Martin, Bonnie L.
Subject: RE: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

Let's go with March 30 at 9:00 am. We'll send a notice to confirm. Thanks,

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justin.allen@ogletree.com | www.ogletree.com | [Bio](#)

From: Cento Law <cento@centolaw.com>
Sent: Friday, March 12, 2021 11:38 AM
To: Allen, Justin A. <justin.allen@ogletreedeakins.com>
Cc: Sheri Hood  <sheri@centolaw.com>; Travis Cohron <tcohron@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
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The 29th or 30th work for P.

"What can be asserted without evidence can also be dismissed without evidence." - Hitch

On Mar 12, 2021, at 9:43 AM, Allen, Justin A. <justin.allen@ogletree.com> wrote:

Thanks G.

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From: Guerino Cento <cento@centolaw.com>
Sent: Friday, March 12, 2021 9:40 AM
To: Allen, Justin A. <justin.allen@ogletreedeakins.com>
Cc: Sheri Hood 😊 <sheri@centolaw.com>; Travis Cohron <cohran@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: Re: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

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March 25th works for Justin's deposition. Get back to you on the dates for Plaintiff.... G

On Mar 11, 2021, at 7:01 PM, Allen, Justin A. <justin.allen@ogletree.com> wrote:

Good evening,
Following up on the below – please let us know about these deposition dates at your earliest convenience.

Thank you,

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From: Allen, Justin A.
Sent: Tuesday, March 9, 2021 2:49 PM
To: 'Cento Law' <cento@centolaw.com>
Cc: 'Sheri Hood 😊' <sheri@centolaw.com>; 'Travis Cohron' <cohran@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: RE: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

Good afternoon,
We heard back from Justin Midkiff that he is not available to be deposed on March 18. We will be moving his deposition to the next Thursday, March 25 at 9:00 AM. Please confirm that this date still works for you.

We will also be moving Plaintiff's deposition to take place after his brother's deposition. Please let us know when Plaintiff is available to be deposed on the following dates: March 26, 30, 31 or April 1.

Thank you,

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From: Allen, Justin A.
Sent: Wednesday, March 3, 2021 4:32 PM
To: 'Cento Law' <cento@centolaw.com>
Cc: Sheri Hood 😊 <sheri@centolaw.com>; Travis Cohron <cohran@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: RE: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

Sounds good, thanks. Let's plan on March 19 for Plaintiff's deposition. A notice of deposition is attached.

Meanwhile, let's go with March 18 for Justin Midkiff's deposition. A notice of deposition and subpoena are attached. Because the subpoena includes a rider for documents, please let us know if you will waive the 7-day notice provision of

Local Rule 45-1 so we can promptly get this deposition scheduled.

Thanks,

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From: Cento Law <cento@centolaw.com>
Sent: Wednesday, March 3, 2021 11:24 AM
To: Allen, Justin A. <justin.allen@ogletreedeakins.com>
Cc: Sheri Hood 😊 <sheri@centolaw.com>; Travis Cohron <tcohran@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: Re: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

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The 19th works for Plaintiff's deposition.

"What can be asserted without evidence can also be dismissed without evidence." - Hitch

On Mar 3, 2021, at 10:40 AM, Guerino Cento <cento@centolaw.com> wrote:

I'll get back to you about the dates for Plaintiff. Any of the dates you picked for Justin Midkiff's deposition work for me.

On Mar 2, 2021, at 3:14 PM, Allen, Justin A. <justin.allen@ogletree.com> wrote:

Good afternoon,
We'd like to stick with March 11 for Mr. Schatz's deposition and look for dates later in March or early April for Plaintiff's deposition. Let me know if any of the following dates work for Plaintiff's deposition:

- March 18, 19, 24, 26, 30, 31
- April 1, 2

Also, we plan to schedule Justin Midkiff's deposition soon. I assume you will also plan to attend, so let me know how March 19, 19, 24, or 25 work for your schedule.
Thanks,

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justin.allen@ogletree.com | www.ogletree.com | [Bio](#)

From: Cento Law <cento@centolaw.com>
Sent: Monday, March 1, 2021 2:49 PM
To: Allen, Justin A. <justin.allen@ogletreedeakins.com>
Cc: Sheri Hood 😊 <sheri@centolaw.com>; Travis Cohron <tcohran@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: Re: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

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Sorry. I was too brief. Plaintiff has that day off. Can we use that day for his deposition and pick another day for the Navient deposition? G

"What can be asserted without evidence can also be dismissed without evidence." - Hitch

On Mar 1, 2021, at 2:15 PM, Allen, Justin A. <justin.allen@ogletree.com> wrote:

G,
The deponent will be located either at his home or office out of state. Is there a particular reason why you need his address?

Thanks

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From: Guerino Cento <cento@centolaw.com>
Sent: Monday, February 22, 2021 12:54 PM
To: Allen, Justin A. <justin.allen@ogletreedeakins.com>
Cc: Sheri Hood 😂 <sheri@centolaw.com>; Travis Cohron <tcohron@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: Re: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

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Here is the [revised Notice of Deposition](#). Please let me know the address where the deponent will be located. G

On Feb 22, 2021, at 8:42 AM, Cento Law <cento@centolaw.com> wrote:

Justin:

Let's go with March 11th. G

"What can be asserted without evidence can also be dismissed without evidence." - Hitch

On Feb 18, 2021, at 11:19 AM, Allen, Justin A. <justin.allen@ogletree.com> wrote:

G,
The Navient representative who primarily handled the investigation, including speaking to Plaintiff by phone and ultimately closing the investigation, was Fraud Investigation Specialist Matthew Schatz. Mr. Schatz is available for a remote deposition on March 11, 12, 16, or 17. Please confirm a date at your earliest convenience.

Thanks,

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From: Guerino Cento <cento@centolaw.com>
Sent: Wednesday, February 17, 2021 9:26 AM
To: Allen, Justin A. <justin.allen@ogletreedeakins.com>
Cc: Sheri Hood 😂 <sheri@centolaw.com>; Travis Cohron <tcohron@clarkquinnlaw.com>; Martin, Bonnie L. <Bonnie.Martin@ogletreedeakins.com>
Subject: Re: Midkiff - Navient Depositions [ODNSS-OGL.003445.000368]

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Hey Justin. I identified the witness (or witnesses) in the Notice. This is a 30(b)(1) for the "Navient representative who conducted, participated in and/or ultimately closed the "identity theft investigation" referenced in your letter to Plaintiff, dated July 15, 2020." So we just need whoever that person is or, if there is more than

one person, we need all of those people.

Please get back to me ASAP with some dates because I need to take this deposition before we can proceed with the next ones, including the 30(b)(6).

G

On Feb 16, 2021, at 12:25 PM, Allen, Justin A.
<justin.allen@ogletree.com> wrote:

Hi Sheri,
Thanks for your email.

G – Plaintiff's initial deposition notice identified a category of employees. Now that you have had an opportunity to review NSL's document production, please let me know the specific deponent you are requesting availability for.

Also, I wanted to let you know we identified an additional call recording and are making a supplemental production today.

Thanks,

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From: Sheri Hood
<sheri@centolaw.com>
Sent: Monday, February 15, 2021 2:35 PM
To: Allen, Justin A.
<justin.allen@ogletreedeakins.com>
Cc: Guerino Cento
<cento@centolaw.com>; Travis Cohron
<tcohron@clarkquinnlaw.com>
Subject: Midkiff - Navient Depositions

[Caution: Email received from external source]

Justin;

G asked me to follow up with you about deposition dates. Do you have any available dates yet?

Thank you,



Sheri Hood
Legal Assistant to G Cento at Cento Law

Phone [\(317\)804-1623](tel:(317)804-1623)
Email sheri@centolaw.com Website www.centolaw.com



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